NEBRASKA DEPARTMENT OF ENVIRONMENTAL QUALITY
Hazardous Waste Compliance Evaluation Inspection Report

Clean Harbors Environmental Services, Inc.
2247 South Highway 71
Kimball, NE 69145
DEQ/EPA Identification Number: NED981723513

Participating Personnel

Clean Harbors Environmental Services, Inc.

Alyssa King	Compliance Specialist
Kevin Wynne	Facility Foreman
Jim Shields	Facility Operations Manager
Kelly Dunnegan	Facility Operations Manager
Mike Sidell	Compliance Specialist
Gerald Pennel	Incinerations Manager
Kole Talkington	Incinerations Compliance
Rich Roylance	Environmental Lab Supervisor
Kyle Lowery	Lab Supervisor
Brad Reader	General Manager
Ken Redding	Maintenance Manager

Nebraska Department of Environmental Quality

Brian Gorman	Program Specialist

Introduction

On September 25-28, 2018, I inspected Clean Harbors Environmental Services, Inc. (CHESI) of Kimball. This was a routine inspection to confirm generator status and determine compliance with Title 128-Nebraska Hazardous Waste Regulations and the RCRA permit.

Opening Conference

I arrived at the site at approximately 8:30 a.m. on September 25 and contacted Ms. King. I explained the purpose of the inspection, and provided Ms. King with state identification and a copy of Chapter 4 of Title 115, Public Records Confidentiality. Ms. King gave consent for me to conduct the inspection but made a claim of confidentiality with regard to generator waste profiles and fingerprint analyses. At no time during the inspection was consent withdrawn. I reviewed hazardous waste manifests, land disposal restriction notices, large quantity generator requirements and documentation required by the facility RCRA permit. I collected no samples. The facility representatives supplied copies of documents identified as Attachments II through XXX to this report.

Facility History

CHESI in Kimball was originally owned and operated by Waste-Tech Services, Inc. The RCRA permit was issued to Waste-Tech in 1988. In 1994, the facility name was changed from Waste-Tech Services, Inc. to Ecova Corporation. In Mid-1995, the facility changed ownership from Ecova Corporation to Clean Harbors, Inc. with headquarters in Braintree, Massachusetts (MAD053452637). Since 2002, the company has acquired several additional hazardous waste incinerators and landfills in Canada and the United States. In 2012, Clean Harbors acquired Safety-Kleen's network of used oil and waste collection services and facilities.

At the time of the inspection, the Kimball facility employed approximately 165 people and operated 24 hours per day, seven days per week. It is located five miles south of Kimball on Highway 71. CHESI owns a section of land in a rural area on which the treatment and storage facility, ash monofill and storm water pond are located. The existing permit was renewed on December 1, 2015 and expires on November 30, 2020. The past two hazardous waste compliance evaluation inspections were conducted by the USEPA on March 27-29, 2018 and June 13-14, 2017.

Process Description

CHESI operates a hazardous waste thermal oxidation unit (TOU) and is permitted to store wastes and treat wastes in a fluidized bed incinerator. Wastes received by the Kimball facility were shipped from one of the other Clean Harbors or Safety-Kleen storage facilities or directly from generators. Drums, bulk liquid tankers and solid waste roll-offs were received directly at the Kimball facility. Rail car tankers of liquid waste were off-loaded into tanker trucks at a Clean Harbors facility in Sterling, Colorado, and delivered to the CHESI, Kimball facility. Solid wastes delivered by rail were off-loaded in intermodal and roll-off containers at a UPRR rail siding leased by CHESI in Kimball and trucked to the facility. There was no rail spur directly to the facility.

Once received and sampled for fingerprint analysis, bulk dry and wet solids were either immediately processed or stored on-site for processing, bulk liquids were directly fed to the incinerator or transferred from the trucks to a tank farm, and non-bulk wastes were stored until they could be processed or shipped off-site. Drum processing consisted of shredding the drum, transferring liquids to the tank farm and consolidating wet and dry solids into feed batches.

Incinerator ash collected by the air pollution control system was transferred to an ash stabilization building where it was partially solidified with water. Ash meeting delisting criteria was disposed of in an on-site Subtitle D monofill. If analysis showed organics were present in excess of delisting criteria, the ash was reprocessed through the incinerator. If analysis showed leachable metals were present in excess of delisting criteria, the ash could be stabilized and reanalyzed to ensure delisting criteria were met before being disposed of at the site monofill. Ash not meeting delisting criteria was shipped off-site as a hazardous waste for disposal.

Waste Streams

CHESI was permitted to accept hazardous wastes listed in Appendix I of their RCRA permit. The permit prohibits CHESI from accepting, storing or incinerating the following wastes:

- Wastes containing greater than 50 mg/kg PCBs
- Wastes containing detectable levels of 2,3,7,8 TCDD equivalents (dioxin)
- Wastes that are reactive or explosive, except as specified in the Part B
- Wastes that are radioactive
- Wastes that are shock sensitive
- Wastes that are biologically infectious

The permit allowed CHESI to store, but not incinerate the following wastes:

- Wastes that are defined as inorganic metal bearing hazardous wastes
- Compressed gas or compressed liquid wastes

Observations (September 25, 2018)

1. Ms. King said she began working under Lezah Saunders as a compliance specialist in February 2018. Prior to that, she worked in the laboratory. Since Ms. Saunders was not available during this inspection, Ms. King assisted me throughout the inspection.

2. Ms. King and Mr. Reader provided the following information about changes and activities at the facility since the hazardous waste compliance evaluation inspection in March, 2018:

    a. The tanks and miscellaneous equipment for paint can shredding in the area designated as 50F in the RCRA permit had not been installed as of the inspection. Mr. Reader anticipated this area would not go into operation until January or February of 2019 at the earliest.

    b. The hydra-pulper (SP-160) installed in Building 55 in 2015 has not been used. The purpose of the hydra-pulper was to clean metal shreds for recycling as scrap metal and to mix solvents with solid wastes to produce fuel blends. The price of scrap metal has not been high enough to warrant its use.

    c. The shredder G-159 that has been approved for installation in Area 55 as an additional shredding step after the shredding tower has not been installed as of the date of this inspection.

    d. A 5-day shutdown was planned for the first week in October for general maintenance, and a large shutdown was planned for April 2019 to replace the entire baghouse system.

3. During my pre-inspection review, I found that six waste codes not listed in Appendix I of the CHESI permit (Acceptable Hazardous Waste Codes) had been reported on wastes received in the 2017 Biennial Report. These included the waste code F027 on Waste Stream 545, P081 on Waste Stream 5952, and waste codes U096, U160, U189, and U205 on Waste Stream 7872. I asked Ms. King if she could provide me the hazardous waste manifests corresponding to those waste streams. She was not familiar with how to do that, but said she would provide that information when Lezah Saunders, the Compliance Manager returned the following week. Prior to completing the inspection that week, Ms. King made copies of the Biennial Report WR pages containing these waste codes (Attachment I).

4. I asked for an inventory of bulk and non-bulk wastes being stored at CHESI. Ms. King said container inventory was high at that time, and that a majority of the waste received was in non-bulk containers. Very few customer roll-off boxes of waste were received. I had driven by the Kimball rail siding the evening of September 24 and confirmed there were no wastes at the rail siding at that time. Due to the sheer size of the non-bulk inventory, I took only a representative page with me at the end of the inspection (Attachment II), but took a complete inventory of bulk containers (Attachment III).

5. Ms. King and I began a visual inspection of the facility, beginning with the 90-day accumulation area in the north yard outside the perimeter security fence. While in route to the 90-day accumulation area, I observed the signage and emergency exits on the security fence. I noted that one emergency exit did not latch correctly (see Photograph 1). The exit was held shut only by a zip-tie. Ms. King said she thought a work order had been issued to fix the latch. She provided a copy of the work order the following morning showing that the latch had been fixed (Attachment XII).

6. The 90-day accumulation area in the north yard was identified as Area C in the RCRA permit. At the time of the inspection, the area contained 38 roll-off containers (see Photographs 2 and 3). All of the containers were closed using tarps, and were labeled "Hazardous Waste." All of the containers were marked with accumulation start dates. The oldest date I found was 8/23/18. Ms. King said the containers held shred debris that could not be fed to the incinerator. The containers were shipped to Clean Harbors, Deer Trail (COD991300484) for disposal.

7. We re-entered the facility and walked the perimeter security fence around the entire facility. The fence consisted of a 6-foot chain link fence with three strands of barbed wire at the top. The fence was in good condition and all gates and remaining emergency exits were latched from the inside.

8. There were numerous vans staged north of Building 57 waiting for the drums to be unloaded. I wrote down the number of seven vans to check how long they had been staged for unloading. Later in the day, Ms. King provided me an e-mail showing that one of the vans had already been unloaded and was empty and the remaining six had been staged for five days or less (Attachment XIII).

9. Mr. Roylance and Mr. Lowery joined us at the 90-day accumulation area outside the laboratory, designated Area A. We inspected the containers accumulated at that time (see Photograph 4). All containers were closed and in good condition. The area was posted with a "No Smoking" sign. I took the following inventory:

    a. Three 55-gallon drums in overpack containers contained acid wastes and were labeled "Hazardous Waste." All three drums were dated 8/20/18.

    b. One 55-gallon drum in an overpack container contained solvent waste and was labeled "Hazardous Waste." The drum was dated 8/20/18.

    c. One 55-gallon drum in an overpack container contained basic waste and was labeled "Hazardous Waste." The drum was dated 8/20/18.

    d. Two 55-gallon drums of ash waste, the oldest dated 8/30/18, were both labeled "Hazardous Waste."

    e. One 55-gallon drum of lab glass was labeled "Hazardous Waste" and dated 9/17/18.

    f. Two 55-gallon drums of lab debris were labeled "Hazardous Waste" and dated 9/7/18.

    g. Nine 55-gallon drums of discarded samples were labeled "Non-hazardous Waste" and dated 9/17/18. When I asked why the discarded samples were considered non-hazardous waste, Mr. Lowery stated this determination was based on the sample exclusion. He said the samples consisted of the digestate from ash samples and would normally be considered a hazardous waste. I cautioned that once the sample has been analyzed and discarded, this exclusion no longer applies. Mr. Lowery said the drums would be re-labeled as hazardous waste.

10. Mr. Shields joined us as we inspected the oxidizer building, Area 57D. This building was used exclusively to store wastes identified as oxidizers and consisted of two racks one shelf high and equipped with steel secondary containment pans below the racks (see Photograph 6). I noted one fiber drum in this area that was labeled "Non-hazardous" and designated Drum #68411956 that did not appear to belong in the oxidizer building (see Photograph 5).

11. We proceeded to the fingerprint lab, Area 57L. This was a small building used for field testing inbound wastes. The building contained several satellite accumulation containers, all of which were closed and labeled to identify their contents. These consisted of a used PPE container and a 1-gallon liquid waste jar at each of the two hoods, and an empty polymer container connected to a sink drain.

12. Container storage areas 57A and 57B were in a single building divided into two parts. Area 57A was a shipping and receiving room for inbound, outbound, and 10-day transfer wastes. The permitted storage area 57A consisted of eight rows each at the inbound and outbound bay doors. Each row was surrounded by secondary containment trenches that discharged to 16 individual sumps (eight inbound and eight outbound). Both areas were nearly empty at the time of the inspection (see Photograph 8). The wastes on the outbound side consisted of some used fluorescent lamp boxes (see Photograph 7), some PCB wastes, and some spent cold parts cleaner, all of which were 10-day transfer wastes all designated to another facility according to its labeling.

13. We proceeded to container storage Area 57B. I made the following observations in this area:

    a. A room with a secure vault had been installed in anticipation of receiving and storing DEA controlled substances. However, Mr. Shields said the vault was never used for that purpose and the DEA license was allowed to lapse.

    b. Area 57B was equipped with 14 racks, each three shelves high (see Photograph 9). Each rack used steel pans below as secondary containment. The racks, and their corresponding pans were divided into sections A through Z. Racks were designated by their number, section, and shelf on the container inventory. For example, Rack 4:H:2 was the fourth rack from the north wall, section H, 2nd shelf up.

    c. The racks were designated for certain types of waste to prevent incompatible wastes from being stored on the same rack, as follows:

Racks 1-4:	Lean water and energetic wastes
Racks 5-7:	Acidic wastes
Rack 8:	Aerosols, DOT Class 9 wastes
Racks 9-11:	Basic wastes
Rack 12:	Non-hazardous wastes
Rack 13:	Reactive, Dangerous when wet wastes
Rack 14:	Lamps

    d. The inventory in Area 57B was high at the time of the inspection, so most of the racks were nearly full of containers. All containers were closed, appeared to be in good condition and labeled for identification. I found no wastes that appeared to be on the incorrect rack. I saw no signs of leakage in the secondary containment pans. I recorded random container numbers to check later against the inventory and found them to be racked as designated on the inventory.

14. Ms. King and I inspected Area 20 next, accompanied by Mr. Dunnegan and Mr. Sidell. Area 20 consisted of a truck wash bay and four sampling bays within a common building. We were unable to enter sampling bays 3 and 4 because they were full of drums waiting to be decanted of liquid, so respiratory protection was required (see Photograph 11). The truck wash, each sampling bay, and an equipment room between them contained one or two used PPE satellite accumulation containers, each of which was closed and labeled "Hazardous Waste." Sampling Bay 2 also contained a closed, labeled 55-gallon satellite accumulation drum for empty aerosol cans (see Photograph 10).

15. We inspected container storage Area 25 next. Area 25 was permitted for both liquid and non-liquid wastes. The area was nearly full of non-bulk containers stacked two high (see Photographs 14 and 25). It was divided into 34 rows from east to west. I inspected the containers and secondary containment in this area. All containers were closed, in good condition, and labeled to identify their contents. The secondary containment appeared to be in good condition and was free of accumulated liquids. I noted the drum number of several containers, some of which appeared to be acidic waste for later profile review (see Photograph 12). A concrete ramp and driveway had recently been constructed so that non-bulk containers could be transported by forklift over to Building 55 for processing (see Photograph 13). Mr. Shields said this ramp and driveway were constructed the week prior to this inspection.

16. We proceeded to container storage Areas 50A and 50B, both of which were permitted for non-liquid wastes only. Both areas contained roll-off boxes of shred wastes awaiting incineration. Area 50A contained nine boxes and Area 50B contained 28 boxes at the time of the inspection. All of the boxes were closed or covered with a tarp, and labeled to identify their contents.

17. Container storage Area 95 was permitted to store both liquid and non-liquid wastes. This area contained both bulk and non-bulk wastes at the time of the inspection. Inventory was high (see Photographs 15 and 24). I inspected the containers and secondary containment in this area. All containers were closed, in good condition, and labeled to identify their contents. The secondary containment appeared to be in good condition and was free of accumulated liquids. I noted the drum number of several containers, some of which appeared to be acidic waste for later profile review. Tank T-926B was used to collect sump water according to Mr. Dunnegan. The sump water was eventually transferred into a frac tank for transfer to the Area 70 tank farm.

18. Lastly, we inspected container storage Area 70C. This area was permitted for non-liquid wastes only. The storage area was filled to maximum capacity with roll-off boxes stacked three high in every slot (see Photograph 16). All of the containers were covered with a tarp and were in good condition. I noted that Container #411736 was missing its label (see Photograph 17. Ms. King reported the label was replaced by the next morning.

Observations (September 26, 2018)

19. I returned to the facility at about 8:30 a.m. on September 26 and began to review waste profile information for containers I selected during my visual inspection of the container storage area the prior day. Ms. King looked up the profile for each container on WinWeb and provided me a copy of those I requested. The profiles are held as business confidential under an existing approval by NDEQ. Mr. Lowery assisted in retrieving fingerprint analyses where requested. The following is a summary of the container profiles I reviewed:

Area	Container # Profile #	Comments
57D	68411956 CH435466	Fiber drum of non-hazardous waste stored in the oxidizer building. Identified as Titanocene dichloride by the waste profile (Attachment IV). No indication that the waste was an oxidizer. The fingerprint analysis (attached to profile) showed the waste was not an oxidizer.
57B	67546987 CH1448562	Rack 9:F:2 for basic wastes. Drum labeled non-hazardous with pH=12 written on it at time of inspection. Profile indicates the pH of the waste is neutral (Attachment V). Fingerprint analysis (attached to profile) lists a pH of 13. Ms. King had the lab verify the pH using a meter and found it to be 12.36.
57B	67510529 29829OB	Rack 4:L:1 for lean water/energetic wastes. Labeled as non-hazardous barium/cadmium containing waste. Profile shows waste is not toxic for either metal by analysis (Attachment VI).
25	68122898 150422	Adipic Acid per label. Profile shows the pH is neutral (Attachment VII).
25	68042598 CH1052918	Human stool samples per label on container. Rendered non-infectious per profile (Attachment VIII).
25	67331216 1268388	Identified as hazardous for antimony and arsenic on the label. Profile describes the waste as an oil/water/sludge mixture with a BTU value of 2,000-5,000 BTU/Lb. and not an inorganic metal bearing waste (Attachment IX).
95	68081500 1471832	Identified as glacial acetic acid on the label. Profile shows the pH as 2.1 – 6.9 (Attachment X). Fingerprint showed a pH of 6.
95	66894964 CH404058	Acetone and HCl listed on label. Profile shows a pH of less than 2 and that waste carries a D002 waste code (Attachment XI). Fingerprint analysis shows a pH of 3 (attached to profile).

20. Mr. Dunnegan and Mr. Sidell joined Ms. King and me to resume the visual inspection. We began at the waste processing building, Area 55. We entered the south mezzanine to observe operation of the shredding tower. The shredding tower was in operation at that time. There were video monitors showing each step in the process. The control board showed oxygen

levels in the air lock and chambers of each shredder. Mr. Dunnegan said shredder functions were locked out until oxygen levels were purged to below 5%. Magnetic separator K-170, knife shredder G-159, and screw conveyor K-143 were not installed yet. The diagram in the mezzanine showed all equipment miscellaneous except for knife shredder G-159.

21. We walked around the outside of Area 55 waste processing building to observe the bay doors, baghouse and carbon canisters. Mr. Dunnegan said emissions from Building 55 were routed to the incinerator when it was operating, so the carbon canisters were not used often. All emission control equipment appeared to be in good condition and the bay doors were tightly closed, with no sign of wastes being tracked outside the building.

22. We entered the west mezzanine of the Area 55 waste processing building to observe the dry solids hoppers H-150A and B and view the remainder of the waste processing equipment. Both hoppers were in use. A clamshell was used to mix and transfer wastes to roll-off containers for storage until incineration. Metal debris and other debris that could not be incinerated was collected in a separate roll-off for shipment to Clean Harbors – Deer Trail (COD991300484). This mezzanine also contained a diagram listing miscellaneous equipment currently in use or approved for use with the exception of knife shredder G-159.

23. We inspected the Area 58 tank farm next. This tank farm consisted of two 20,000-gallon tanks and four 23,000-gallon tanks (see Photograph 18). Mr. Dunnegan said all of the tanks were being used for fuel blending wastes. The tanks and load-out area (see Photograph 19) were equipped with secondary containment. Liquid wastes generated by the Area 55 waste processing building were transferred into this tank farm. Inbound liquid wastes with high BTU value could be off-loaded into these tanks as well. The contents of the tank farm could then either be pumped over to the Area 70 tank farm, or loaded onto tanker trucks for off-site shipment. I made the following observations in this area:

    a. There were three used PPE satellite accumulation containers in this area. All three containers were closed and labeled "Hazardous Waste."

    b. There was one 55-gallon satellite accumulation drum in the load-out area for strainer clean-out waste. This drum was closed and labeled "Hazardous Waste."

    c. The miscellaneous unit S-147 was a strainer/magnetic separator in the load-out area. It was covered with an insulation blanket at the time of the inspection, but I confirmed it was marked with its tag number upon removal of the insulation blanket.

    d. The tanks and secondary containment all appeared to be in good condition at the time of the inspection.

24. The thaw building, Area 57F required respiratory protection to enter, so I could not inspect the secondary containment. By looking through the windows of the ten bays, I saw each had a roll-off container in it except for Bay 3, and a roll-off was in the process of being placed in that bay at the time of my inspection. Mr. Dunnegan said the thaw building was used to

warm boxes of wastes in the wintertime as it could be heated. In the summer, the building was used to store boxes that might be dripping liquid since the building was designed with secondary containment.

25. Mr. Pennel and Mr. Talkington joined Ms. King and me as we inspected the incinerator and Area 45. We stopped in the control room and were told that dry solids, viscous (lean water), and non-viscous (energetic) wastes were being fed at the time of the inspection. Wet solids and direct feed wastes were not being incinerated at that time. I made the following observations while inspecting this area:

    a. Two cure bins (10 yd^3 containers) and one smaller steel box were staged on the ground level (see Photograph 20). All three containers were closed and labeled "Hazardous Waste." One cure bin was marked as containing used bed media and was dated 9/26/18. The second cure bin was marked as containing oversize material and was dated 9/25/18. The smaller steel box was marked as containing F-316 dust and was dated 8/15/18. All of these wastes were generated by the bed letdown system vibratory screen. Mr. Pennel said the used bed media might be reused if tests showed it was not contaminated with too much sodium. However, all three containers were managed as 90-day accumulation containers.

    b. Level 2 of the incinerator contained all of the waste feed nozzles (see Photograph 21). Mr. Pennel said there were two wet solids nozzles, two viscous waste nozzles and three non-viscous waste nozzles on both the east and west side of the incinerator. Dry solids were fed via two feed screws on the west side only and direct feed wastes were fed through the three non-viscous feed nozzles on the east side only. All feed nozzles appeared to be in good condition at the time of the inspection.

    c. Level 3 of the incinerator was where the two dry solids chutes dropped into the feed screws. Level 3 also contained the bed letdown vibratory screen, S-334 (see Photograph 22). Both appeared to be in good condition with no signs of releases and the vibratory screen was marked with its tag number.

    d. Level 4 of the incinerator was where the splitter screw divided the dry solids into two separate feed chutes. A 55-gallon satellite accumulation drum was staged next to the splitter screw for the accumulation of any clean-out wastes (see Photograph 23). The drum was closed and labeled "Hazardous Waste." Level 4 also contained the induced draft fan and dust collector for the bed letdown vibratory screen, S-334 on Level 3. The dust from this collector dropped down into the small steel box on the ground level.

    e. The solid waste isolator flap gates were on Level 5 of the incinerator. They appeared to be operating properly and there were no signs of releases.

    f. The dry solids conveyor dropped into the chute on Level 6 of the incinerator. I saw no evidence of releases around this equipment.

g. We returned to ground level and followed the incinerator gas stream through the pollution control system to the stack. I noted several used PPE satellite accumulation containers while walking this area. I also noted satellite accumulation containers for sweepings and used aerosol cans. All were closed and labeled "Hazardous Waste."

h. Mr. Pennel said a large outage was planned for April 2019 during which the entire baghouse system would be replaced. He said the current baghouse system had six separate baghouses in it and all six were in use.

i. There were two 90-day accumulation containers outside the building under the ash conveyor. Both were steel cure bins used to collect ash. Both cure bins were closed and labeled "Hazardous Waste." One cure bin was marked "Cat Vac" and was connected to a vacuum system to clean up ash around the base of the conveyor system. The second cure bin was marked "Drop Box" and was connected via a chute to the conveyor to capture losses from the conveyor. Both cure bins were marked with an accumulation start date of 9/26/18.

26. We inspected the ash stabilization building, Area 85 next. Ash processing was shut down while we were inside the building. I made the following observations:

a. The interior of the building was permitted as a container storage area. Cure bins of ash, used bed media and oversize material were accumulated inside the building. All of the cure bins were labeled to identify their contents. There were 36 day bins of bed media, four day bins of oversize material, four day bins of drop box ash, and one day bin of Cat-Vac ash in storage at the time of the inspection.

b. Used PPE satellite accumulation containers were on the 1st and 2nd level of the ash stabilization building. Both were closed and labeled "Hazardous Waste."

c. Miscellaneous units G-952 (shredder) and G-955 (pulverizer) were in good condition according to Mr. Pennel, but have not been in use. Mr. Pennel was not sure if the equipment had ever been used. Both units were marked with their tag numbers.

d. Ash was processed through a transfer hopper designated H-969 and a mixing tank designated A-951. Mr. Pennel said both tanks were operational, but that A-951 was scheduled to be replaced in 2019.

e. Mr. Pennel provided the status of the 3,200 ft^3 ash day bins outside the building in Area 80 as follows:

Bins A – D: Full.
Bin E: In process of being filled.
Bins F – G: Empty
Bin H: In process of being emptied.

27. We exited the ash stabilization building to inspect the eight 3,200 ft^3 ash day bins in Area 80. The bins appeared to be in good condition. I found no signs of ash leaks. Mr. Pennel said none of the ash has failed delisting for several years.

28. There were two permitted hazardous waste storage tanks at the wastewater treatment building (Area 90). These were tanks T-616 and T-688. Both tanks were outside the building and within concrete secondary containment. Both tanks were in operation and appeared to be in good condition. Mr. Pennel said process water stored in the tanks could be transferred to the Area 70 tank farm from T-688 for incineration. The secondary containment around the tanks was in good condition and free of accumulated liquids. No wastes were being stored inside the wastewater treatment building.

29. The Area 70 tank farm consisted of eight 20,000-gallon hazardous waste storage tanks and four 20,000-gallon hazardous waste feed tanks, all within secondary containment (see Photograph 26). There were load-out areas on both the north and south side of the tank farm where tanker trucks could transfer wastes into the storage tanks or to the direct feed system. Both load-out areas were also constructed with secondary containment. I made the following observations while inspecting the Area 70 tank farm:

    a. Mr. Pennel said tanks T-116 and T-118 were out of service. New tanks were installed but not yet in service (see Photographs 26 and 27). All other tanks were in service and appeared to be in good condition.

    b. I noted three used PPE satellite accumulation containers and two strainer clean-out waste satellite accumulation drums around the tank farm. All of these satellite accumulation containers were closed and labeled "Hazardous Waste."

    c. Secondary containment around the tank farm and in the load-out areas were free of accumulated liquids and appeared to be in good condition.

    d. All miscellaneous units associated with the Area 70 tank farm were in service and were marked with their tag numbers. These included grinder G-129, strainers S-102, S-323A and S-323B, and strainer/magnetic separators-103, S-104, and S-105.

    e. The direct feed system, tank T-327, and its associated secondary containment all appeared to be in good condition.

30. Area 50E was a permitted container storage area with two Roberoller agitated tanker trailers to hold wastes. Mr. Pennel said the Roberoller tankers were used to feed wet solids to the incinerator. Both Roberoller tankers were in service and labeled "Hazardous Waste," though he said the agitators did not work. The area was surrounded by secondary containment curbing that appeared to be in good condition.

31. We entered the waste receiving building, which consists of Areas 50C (tank storage), 50D (container storage), and 50F (paint can shredding). I made the following observations in this building:

    a. Four hopper-bottom tanks designated H-342A through D were not in service according to Mr. Pennel, but had new hopper bottoms installed on them (see Photograph 28). These tanks were once wet solids feed tanks, but were being re-purposed for use in the paint can shredding process. A permit modification approved 12/30/16 re-designated these tanks from Area 50C to Area 50F.

    b. We viewed the dry solids hoppers H-170A and B from the mezzanine. Both hoppers were in service. H-170B was divided into two tanks with a partition that was added in the middle. Mr. Pennel said the partition was scheduled to be removed from H-170B sometime in October, as it was no longer needed to build separate feed batches.

    c. Dry solids feed hopper H-386 was in service and was where batches from H-170B were transferred to be fed to the incinerator.

    d. Wet solids hopper H-180 was in service and was used to transfer wet solids from truck to the Roberollers in Area 50E.

    e. Container storage area 50D was not in use for waste storage. It was equipped with a rack system similar to that in Area 57B, but only equipment and products were being stored in this area at the time of the inspection. Eventually, it was intended for storage of paint can wastes that would be processed in Area 50F.

    f. Area 50F was permitted for shredding paint cans with the paint accumulated in tank T-141. The tank was formerly part of Area 50C prior to the 12/30/16 permit modification approval. At the time of this inspection, none of the miscellaneous units permitted for Area 50F had been installed (see Photograph 29). These included a shredder, G-158, liquid/solid separator screw, K-343A, transfer conveyor, K-343C, and two strainers, S-151 and S-153. The miscellaneous units were part of a permit modification approved 6/30/17.

32. We exited the waste processing building and entered container storage Area 40. This area was permitted for storage of wastes with no free liquids. At the time of the inspection, the area was not in use for waste storage (see Photograph 30). It contained a large compactor box and some other equipment.

33. Ms. King and I returned to the main office to begin records review. I began by reviewing unresolved manifest discrepancies that had been reported in the past 12 months. Based on my pre-inspection file review, there were nine unresolved manifest discrepancies reported. Ms. King reviewed her list of unresolved manifest discrepancies with me and we found the following:

a. The 9/20/17 unresolved manifest discrepancy for Manifest No. 011017758FLE was resolved on 10/17/17. I did not find a copy of that resolution in the NDEQ files. Ms. Saunders e-mailed a copy of the 10/17/17 letter post-inspection (Attachment XIV).

b. An unresolved manifest discrepancy for Manifest No. 006460160SKS was reported to the generator on 6/4/18 and remained unresolved. There was no record of this unresolved discrepancy being reported to NDEQ. Ms. Saunders e-mailed a copy of the manifest post-inspection showing the container had been diverted to an alternate facility and did not constitute an unresolved manifest discrepancy (Attachment XV).

34. Ms. King and I then reviewed incident reports over the past year. All incident reports she had on file had been reported to NDEQ. There had been only two fire incidents in 2018 and both were in Building 55.

35. I began reviewing inspection records next. Nearly all inspection records were maintained electronically. Ms. King opened the application and I began with daily inspection requirements going back to April 1, 2018. I made the following observations while reviewing daily inspections:

a. Inspections were organized by permitted area. I confirmed that all daily inspections required by the permit and Part B application were covered for each area. However, existing equipment in Area 50F was still being inspected under the Area 50C checklist. No inspection checklist for the miscellaneous units in in Area 50F had been developed yet.

b. The system showed that all daily inspections had been completed back to April 1, 2018.

c. Inspection findings resulting in a work order were flagged red by the system. I reviewed a number of work orders and found that many were repetitious for tasks such as removing precipitation from secondary containment sumps (Attachment XVI) or repairing damage to secondary containment coating (Attachment XVII). Work orders for areas other than for container or tank storage were more variable, but appeared to be closed out within 90 days (Attachment XVIII).

Observations (September 27, 2018)

36. I returned to the facility at about 8:30 a.m. on September 27 and resumed my review of inspection records with Ms. King. I completed my review of daily inspections and began reviewing weekly inspection records going back to April 1, 2018. These were also maintained electronically. I made the following observations while reviewing these records:

a. 90-day accumulation Area A outside the laboratory was inspected using a dedicated checklist. No work orders were recorded during that timeframe and all inspections were completed.

b. 90-day accumulation Area B (west Area 70 tank farm) and Area C (north yard) were incorporated onto one checklist for both areas. There were work orders to fix labeling issues and a leaking container.

c. The 90-day accumulation containers below the incinerator were incorporated into the incinerator inspection checklist and included the cure bins for oversize material, bed letdown media, and F-316 dust.

d. The 90-day accumulation containers near the ash stabilization building were not listed on any inspection checklist for that area. Ms. King inquired with Mr. Talkington who confirmed the cure bins for the Cat Vac ash and Drop Box ash were both inspected weekly, but were not specifically recorded. I recommended those 90-day containers be listed on the inspection checklist for Area 80 or 85.

37. Daily and weekly carbon canister breakthrough inspections were also maintained electronically. I reviewed these records back to April 1, 2018 and found one record of breakthrough on the Area 58 tank farm carbon canister (Attachment XIX). The resulting work order showed new carbon was added to the canister. All inspections had been completed.

38. Quarterly TOU skin temperature inspections were still recorded on paper (Attachment XX). Ms. King provided records of these inspections back to October 1, 2017 and all inspections had been completed.

39. Annual comprehensive tank inspections were maintained electronically, but also in paper form to record the increased frequency of monitoring when the skin thickness fell below a certain tolerance. Mr. Redding provided the paper records. All tanks requiring annual comprehensive thickness testing had been tested in October and November of 2017 (Attachment XXI). Results of the testing found the following:

    a. Ash mixing tank A-951 required more frequent testing, every six months in one area and every month in another. The tank was scheduled for replacement in 2019.

    b. Tanks T-112 and T-118 were moved to a monthly test schedule. Records were available for monthly tests until T-118 was taken out of service.

    c. Tank T-116 was taken out of service in July of 2017.

40. RCRA air inspections included weekly and monthly Subpart BB inspections and annual Subpart CC Procedure T-Criteria for buildings 50 and 55. The Subpart BB inspections were maintained electronically and were all available. The annual Procedure T-Criteria and Certification of Buildings 50 and 55 were recorded on paper, with the last test being done for each building on 4/27/18. Results indicated both buildings passed.

41. Ms. King and I conducted a visual inspection of the ash monofill. The ash monofill received delisted ash from the TOU for disposal. The monofill consisted of five cells numbered 1, 2, 4, 5, and 6 with Cell 6 being the active disposal area at the time of the inspection (see Photographs 31-36). All other cells were full and covered. Cell 3 was not yet constructed. Ms. King said Cell 6 was experiencing a leak in the primary liner resulting in the generation of leachate between liners. Efforts to identify and repair the leak have been unsuccessful.

42. We drove through the scrap equipment yard on our way back to the active portion of the facility. I noted numerous retired roll-off containers and tanks. Ms. King said the tanks and containers were empty. I noted one roll-off containing waste tires.

43. Ms. King and I met with Mr. Reader briefly upon returning to the office. He explained that CHESI has made two attempts to locate the leak in Cell 6 of the ash monofill. A company called Leak Locater Services of San Antonio, Texas was hired to do the work. That company has successfully located and repaired liner leaks in the past for CHESI. The process involves drilling holes through the ash on a 20-foot grid, flooding the space between liners with an electrolyte, inducing a current, and checking each drill hole for conductivity. The first attempt identified a potential leak area. That area was patched, but the next significant rain event resulted in leachate generation again between the liners. A second test was done, but the results were inconclusive, so CHESI has proposed an alternative means of preventing leachate generation using a surface collection method.

44. I asked Mr. Reader about the retired hazardous waste tanks in the scrap yard. He said all tanks were triple rinsed before being scrapped. It was his intention eventually to sell the materials in the scrap yard for scrap metal value.

45. Ms. King and I returned to our records review. We reviewed calibration records going back to July 1, 2017. All calibrations required by Appendix V of the RCRA permit had been performed. These records were maintained in paper form. Ms. King provided a copy of the 2018 records (Attachment XXII).

46. I met with Mr. Wynne to discuss my findings during a pre-inspection review of incinerator operating conditions using the NDEQ remote link to the CHESI distributed control system (DCS). We discussed the following:

    a. I noted that periodically some parameters did not seem to be recorded by either server for a short period of time in the historian program, but then would be available the next time I raised the plot. He did not have an explanation, except to say the data was available, but the historian program may not always load it properly each time.

b. I noted that the grain loading meter (tag AT-429A) seemed to stop functioning as usual beginning on August 27, 2018 (Attachment XXXI). Grain loading is a representation of particulate matter emissions. Mr. Wynne suggested alternative ways to plot this function, but did not know why the grain loading meter function had changed that day. He said he would look into it.

47. I began reviewing hazardous waste manifests next. I asked Ms. King how CHESI was uploading manifest information under the E-manifest system to the RCRAInfo database. She was not sure. We inquired with Mr. Shields who said that paper manifests are still used by CHESI. However, he thought the manifest data was uploaded directly from the WinWeb system to RCRAInfo by Clean Harbors at the corporate level. Since paper copies of manifests were being maintained, I decided to review those.

48. Inbound manifests were assigned an authorization number that distinguished between bulk (B) and non-bulk or van (V) shipments followed by the year, month, and numeric order of the manifest received during that month. For example, Authorization Number B1805032 referred to the 32nd manifested bulk shipment in May of 2018. Mr. Shields estimated that around 130 bulk manifests were received each month. Since the manifests were filed in groups of ten, I picked the following bulk inbound manifests to review: B1805031-B1805040 and B1808001-B1808010. Bulk shipments included both tanker trucks and roll-off containers. I made the following observations:

    a. Attached to each signed manifest were a manifest addendum (if needed), the land disposal restriction (LDR) notice, scale tickets, waste disposition sheet, notice to generator, and inbound bulk loads checklist (Attachments XXIII and XXIV).

    b. Manifest B1808008 was an international shipment from Canada. Attached to that manifest were the following additional documents: a proforma invoice, a TSCA certification form, a safety data sheet (SDS), a Canadian export permit for hazardous waste, and a Canadian manifest.

    c. If there was a discrepancy of some sort, a discrepancy resolution letter was also attached to the manifest.

    d. All manifests I reviewed were signed by CHESI as the designated facility and were accompanied by an LDR notice.

Observations (September 28, 2018)

49. I returned to the facility at about 8:30 a.m. on September 28 and resumed my review of manifest records with Ms. King and Mr. Shields. I reviewed the following inbound van manifests: V18052221-V18052230, V18052351-V18052360, V18084021-V18084030, and V18084191-V18084200. Mr. Shields estimated that an average of 3,700-3,800 van manifests were received each month. I made the following observations while reviewing these manifests:

    a. Attached to each signed manifest were the LDR notice, notice to generator, packing list (if needed for a lab pack), and manifest addendum (if needed) (Attachments XXV and XXVI).

    b. All manifests were signed by CHESI as the designated facility and were accompanied by an LDR notice.

50. I began reviewing outbound manifests next. An authorization number similar to inbound manifests was used on outbound manifests except that the bulk (B) or van (V) was followed by O for outbound. I reviewed the following outbound manifests: BO1805051-1805060, BO1808011-BO1808020, VO1805011-VO1805020, and VO1808011-VO1808020. I made the following observations while reviewing outbound manifests:

    a. Manifests for outbound van loads were accompanied by the LDR notice and a manifest addendum (if needed) (Attachment XXVII).

    b. Manifests for outbound bulk loads were accompanied by a manifest addendum (if needed), a scale ticket, an outbound bulk material shipment approval form, and an LDR notice (Attachment XXVIII).

    c. Manifests for outbound bulk loads of site-generated debris were shipped under a common profile and one-time LDR notice, so there was no LDR attached to the manifest. Mr. Shields was able to produce a copy of the one-time LDR notice for these shipments (Attachment XXIX).

    d. All manifests were signed by the designated facility. For van loads, the designated facilities were usually Clean Harbors Aragonite (UTD981552177), Lone Mountain (OKD065438376), El Dorado (ARD069748192), or San Jose (CAD059494310). For bulk shipments, designated facilities were generally either Clean Harbors Deer Trail (COD991300484), or Aragonite (UTD981552177).

    e. Mr. Shields estimated that around 2,500 non-bulk and 100 bulk containers were shipped each month.

51. I asked Ms. King for the WinWeb Tracking Activities report for a bulk liquid, bulk solid, and two non-bulk waste shipments, pulling from inbound manifests I reviewed. The following is a summary of each:

    B1805031 was a bulk liquid tanker trailer that was assigned Tracking Number 65706501 upon receipt. The tracking report showed the tanker was received and off-loaded into tank T-114 on 5/8/18, transferred into tank T-360 on 5/12/18 and incinerated on 5/13/18, 5/14/18, and 5/15/18 (Attachment XXIII).

    B1805031 is a bulk solids roll-off that was assigned Tracking Number 65709305 upon receipt. The tracking report showed the roll-off was received on 5/8/18, dumped in hopper H-170A on 5/15/18, transferred to hopper H-170B on 5/16/18 and incinerated on 5/18/18 (Attachment XXIV).

    V18052228 is a van shipment consisting of two drums of liquid waste. The drums were assigned Tracking Numbers 65406152 and 65406153. The tracking reports for each drum show they were received at CHESI on 5/18/18, transferred into another van on 5/22/18, shredded and transferred into hopper H-150D (B) on 5/24/18, hopper H-170A on 8/19/18, H-170B on 8/20/18 and incinerated on 8/21/18 (Attachment XXV).

    V18084193 is a van shipment consisting of three containers of solid waste. The containers were assigned tracking numbers 67538469, 67538470, and 67538471. The tracking reports for each drum show they were received on 8/31/18, stored in Area 25 on 9/10/18, shredded and transferred into hopper H-150D (B) on 9/19/18, transferred to hopper H-170A and B on 9/25/18, and incinerated on 9/26/18 (Attachment XXVI).

52. Mr. Reader followed up with me regarding the problem with the grain loading meter (tag AT-429A) that I discussed with Mr. Wynne the prior day (reference Observation 46.b). Mr. Reader said the instrument was checked and it was discovered that one of the wire leads was damaged and not making good contact with the probe. He said the problem was fixed and provided a copy of the work order (Attachment XXX).

Exit Interview

Prior to departing on the morning of September 28, I conducted an exit interview with the following personnel:

Brad Reader	General Manager
Alyssa King	Compliance Manager
Jim Shields	Facility Operations Manager
Ken Redding	Maintenance Manager
Kelly Dunnegan	Operations Manager
Rich Roylance	Lab Manager
Gerald Pennel	Incinerations Manager

I presented a summary of observations I made during the CEI. I stated that a copy of the inspection report would be available within six weeks. I also stated that an agency review of the report would be required before a compliance determination could be made. Violations may be alleged in the cover letter accompanying the report. I completed an NDEQ Inspection Exit Summary form, which Mr. Reader signed to acknowledge receipt (Attachment XXXII).

Attachments

I.	2017 Hazardous Waste Report WR Forms, Pages 182, 1984, and 2624 (4 pages)
II.	Excerpt from Non-bulk Container Inventory for 9/25/18 (1 page)
III.	Bulk Container Inventory for 9/25/18 (15 pages)
IV.	Waste Material Profile Sheet, No. CH435466 and Fingerprint Report (4 pages) **********SEE CONFIDENTIAL FILE**********
V.	Waste Material Profile Sheet, No. CH1448562 and Fingerprint Report (6 pages) **********SEE CONFIDENTIAL FILE**********
VI.	Waste Material Profile Sheet No. 29829OB (3 pages) **********SEE CONFIDENTIAL FILE**********
VII.	Waste Material Profile Sheet No. 150422 (3 pages) **********SEE CONFIDENTIAL FILE**********
VIII.	Waste Material Profile Sheet No. CH1052918 (4 pages) **********SEE CONFIDENTIAL FILE**********
IX.	Waste Material Profile Sheet No. 1268388 (4 pages) **********SEE CONFIDENTIAL FILE**********
X.	Waste Material Profile Sheet No. 1471832 (4 pages) **********SEE CONFIDENTIAL FILE**********
XI.	Waste Material Profile Sheet No. CH404058 and Fingerprint Report (4 pages) **********SEE CONFIDENTIAL FILE**********
XII.	Work Order No. 040013 for Perimeter Fence Emergency Gate (1 page)
XIII.	List of Van Receipt Dates (1 page)
XIV.	October 17, 2017 Notice of Resolved Manifest Discrepancy Letter (1 page)
XV.	Manifest No. 6460160SKS dated 6/12/18 (1 page)
XVI.	Area 25 Inspection Checklist for 6/25/18 and Work Ticket 16849122 (3 pages)
XVII.	Area 25 Inspection Checklist for 7/16/18 and Work Ticket 16625093-001 (7 pages)
XVIII.	Area 45 Inspection Checklist for 8/10/18 and Work Ticket 17491410 (4 pages)
XIX.	Daily Hydrocarbon Breakthrough Checklist for 6/6/18 and Work Ticket 16588613 (4 pages)
XX.	Quarterly TOU Skin Temperature Inspection dated 7/12/18 (1 page)
XXI.	Annual Tank Ultrasonic Thickness Inspection Log dated 11/14/17 (6 pages)
XXII.	2018 Annual Calibration Records (4 pages)
XXIII.	Bulk Inbound Manifest No. 11712639FLE and Attachments (8 pages)
XXIV.	Bulk Inbound Manifest No. 11712623FLE and Attachments (8 pages)

XXV.	Non-Bulk Inbound Manifest No. 6235873SKS and Attachments (6 pages)
XXVI.	Non-Bulk Inbound Manifest No. 11892821FLE and Attachments (8 pages)
XXVII.	Non-Bulk Outbound Manifest No. 10885188FLE and LDR Form (2 pages)
XXVIII.	Bulk Outbound Manifest No. 11712679FLE and Attachments (6 pages)
XXIX.	Bulk Outbound Manifest No. 11712690FLE and One-Time LDR Notice (11 pages)
XXX.	Work Order No. 040051 for AT-429A Probe Repair (1 page)
XXXI.	Particulate Emissions Plot from 8/25/18 through 9/1/18 (1 page, 11X17)
XXXII.	Inspection Exit Summary (1 page)
XXXIII.	NDEQ Clean Harbors RCRA CEI Checklist (56 pages)
XXXIV.	Photographs (36 photos)

Program Specialist — Date: 10/24/18

Compliance Unit Supervisor — Date: 11-8-18

Attachment I
2017 Hazardous Waste Report WR Forms,
Pages 182, 1984, and 2624
(4 pages)

United States Environmental Protection Agency

HAZARDOUS WASTE REPORT 2017

WASTE RECEIVED FROM OFF SITE (WR) FORM

1. Waste 544

A. Waste Description	TOXIC LIQUIDS FLAMMABLE ORGANIC NOS						
B. EPA Hazardous Waste Codes	D001 P071 P044						
C. State Hazardous Waste Codes							
D. EPA ID Number	NMD002208627	E. Form Code	W004	F. Management Code	H040		
G. Quantity	11.00	UOM	Pounds	Density	0.00	☐ lbs/gal	☐ sg

2. Waste 545

A. Waste Description	TOXIC LIQUIDS ORGANIC NOS						
B. EPA Hazardous Waste Codes	U010 D011 U080 P199 U328 D037 F027 U038 P077 U058 D008 U048 U012 P051 U248 U225 U211 P020 U101 P041 D039 U044 P082 U185 U188 D010 P027 D022 P127 P194 U236 U411 P066 U129 U043 D004 P075 D040 P123 P048 ...(comments)						
C. State Hazardous Waste Codes							
D. EPA ID Number	NMD002208627	E. Form Code	W004	F. Management Code	H040		
G. Quantity	1,800.00	UOM	Pounds	Density	0.00	☐ lbs/gal	☐ sg

3. Waste 546

A. Waste Description	TOXIC SOLIDS ORGANIC NOS						
B. EPA Hazardous Waste Codes	D008 P113						
C. State Hazardous Waste Codes							
D. EPA ID Number	NMD002208627	E. Form Code	W004	F. Management Code	H040		
G. Quantity	133.00	UOM	Pounds	Density	0.00	☐ lbs/gal	☐ sg

4. Comments

W545: (waste code) P042 U170 D007 P004 U165 U144 U240 U081 D019 P120 D005 P059 U247 D031 U279 U007

United States Environmental Protection Agency

HAZARDOUS WASTE REPORT 2017

WASTE RECEIVED FROM OFF SITE (WR) FORM

1. Waste 5950

A. Waste Description	ENVIRONMENTALLY HAZARDOUS SUBSTANCES SOLID NOS LEAD						
B. EPA Hazardous Waste Codes	D008						
C. State Hazardous Waste Codes							
D. EPA ID Number	AKR000003806	E. Form Code	W002	F. Management Code	H141		
G. Quantity	22.00	UOM	Pounds	Density	0.00	☐ lbs/gal	☐ sg

2. Waste 5951

A. Waste Description	ENVIRONMENTALLY HAZARDOUS SUBSTANCES SOLID NOS TRIVALE						
B. EPA Hazardous Waste Codes	D007						
C. State Hazardous Waste Codes							
D. EPA ID Number	AKR000003806	E. Form Code	W002	F. Management Code	H141		
G. Quantity	412.00	UOM	Pounds	Density	0.00	☐ lbs/gal	☐ sg

3. Waste 5952

A. Waste Description	NITROGLYCERIN SOLUTION IN ALCOHOL						
B. EPA Hazardous Waste Codes	D001 P081						
C. State Hazardous Waste Codes							
D. EPA ID Number	AKR000003806	E. Form Code	W004	F. Management Code	H040		
G. Quantity	2.00	UOM	Pounds	Density	0.00	☐ lbs/gal	☐ sg

4. Comments

EPA ID Number **NED981723513**

United States Environmental Protection Agency

HAZARDOUS WASTE REPORT 2017

WASTE RECEIVED FROM OFF SITE (WR) FORM

1. Waste 7870

A. Waste Description	COMBUSTIBLE LIQUID NOS SOLVENT SLUDGE						
B. EPA Hazardous Waste Codes	D018 D008 D006 D039 D001 D040						
C. State Hazardous Waste Codes							
D. EPA ID Number	WAD981769110	E. Form Code	W204	F. Management Code	H040		
G. Quantity	800.00	UOM	Pounds	Density	0.00	☐ lbs/gal	☐ sg

2. Waste 7871

A. Waste Description	ENVIRONMENTALLY HAZARDOUS SUBSTANCES LIQUID NOS						
B. EPA Hazardous Waste Codes	U389 K015 F034 U148 K040 U031 U109 U152 U155 F025 U196 U222 U138 K030 K150 F002 D008 K041 U387 K001 U328 F035 U140 D041 U023 F007 U238 U112 F001 K147 K050 U183 U187 F012 U211 P089 U177 U069 K002 P028						
C. State Hazardous Waste Codes	...(comments)						
D. EPA ID Number	~~WAD981769110~~	E. Form Code	W204	F. Management Code	H040		
G. Quantity	441,532.00	UOM	Pounds	Density	0.00	☐ lbs/gal	☐ sg

3. Waste 7872

A. Waste Description	FLAMMABLE LIQUIDS NOS 1METHOXY2PROPANOL						
B. EPA Hazardous Waste Codes	F002 U159 U210 U161 D005 U220 D018 F008 U239 F005 D035 U002 D039 U154 F003 D001 U019 F001						
C. State Hazardous Waste Codes							
D. EPA ID Number	WAD981769110	E. Form Code	W204	F. Management Code	H040		
G. Quantity	2,289.00	UOM	Pounds	Density	0.00	☐ lbs/gal	☐ sg

4. Comments

United States Environmental Protection Agency

HAZARDOUS WASTE REPORT 2017

WASTE RECEIVED FROM OFF SITE (WR) FORM

W7871: (waste code) U174 U243 K034 D030 U210 K005 U145 D018 P039 U022 U410 F032 K106 K171 K045 K117 U097 D025 U082 K044 K018 K114 D020 U367 K103 U208 K029 K097 U004 U131 U078 U132 U059 U061 D037 U034 U075 U048 K105 U090 K112 U193 U020 U099 K169 U028 F009 K085 U404 U235 U142 U084 K032 U200 U182 U225 U364 K086 U247 U018 K028 D002 U089 U062 K136 U189 K149 U186 U039 U126 K051 U161 D005 K107 U053 U220 F004 D007 U179 U169 U067 U134 U178 K157 U279 U045 D026 U052 U206 U017 K071 U117 U115 K116 U007 D017 U150 U042 U127 U101 U058 U271 U248 K123 U209 D014 D028 P001 K142 U012 F008 U087 K087 U162 K060 K126 D011 U072 D015 U079 U055 K083 U029 D034 U086 K172 K048 K125 U073 K084 K141 K101 K156 U044 U223 U094 U133 U124 K093 K110 K102 U081 P012 U237 U003 U091 U019 U076 U009 K096 U194 U125 D024 K049 U226 K113 D023 K025 U060 U047 U030 U136 U006 U141 K109 K143 K046 U191 U170 U353 D012 K009 U249 U026 U239 D004 U135 U165 K036 K031 U146 U118 U035 K004 U116 U122 K038 K021 U024 U203 K019 D001 F038 F011 U234 U105 U066 U158 K016 U184 D009 U185 F003 U041 U278 K035 U149 U221 U113 P075 U088 U168 U111 P044 K148 U027 U160 D039 F039 U188 K118 U103 U108 U032 U156 U106 K026 K069 U240 K095 P042 K100 D040 U197 U147 U110 U171 U395 U001 U153 U014 K124 U037 U070 U144 U021 D019 U394 D043 K111 D032 D038 U092 D031 U167 U201 U068 U373 U011 K006 U119 K033 F019 U409 K062 K052 U063 K145 U137 U128 F005 U213 U130 U077 D006 P037 K104 D027 U051 U064 U056 U123 U016 U205 U046 U190 U043 K014 U159 U114 F024 D016 U129 U095 D022 K094 F037 D036 K151 U192 D035 U107 U074 P127 K037 U057 U005 K024 K020 U071 U172 U157 U033 P102 U002 D042 U207 U164 K108 K022 U204 U246 K011 U163 U036 U176 U372 U050 U010 U228 U121 U180 U219 U015 D029 U080 K027 U038 D010 U154 U102 K073 U093 U181 P022 K007 U359 K023 K144 U096 K042 U049 U227 K003 K039 K047 D033 K170 U173 U166 F010 D013 D021 K008 U244 U411 U218 U083 U085 F006 K017 U143 U236 U025 U098 K115 P108 U008 K013 U120 K010

OK

Attachment II

Excerpt from Non-bulk Container Inventory for 9/25/18

(1 page)

KP	CCC	65718858	5/17/2018	25D:2	Philip Environm	178	LBS	CCC	YES	CH388907	1805148
KP	FB1	67148481	8/8/2018	25D:2	Sherwin Willian	3773	LBS	FB1	YES	1670688	1808077
KP	CCC	67271590	8/31/2018	25D:2	Click Bond (CL2	340	LBS	CCC	YES	872483	1808282
KP	CCC	67271591	8/31/2018	25D:2	Click Bond (CL2	324	LBS	CCC	YES	872483	1808282
KP	CCC	67810967	8/30/2018	25D:2	Santa Barbara C	70	LBS	CCC	YES	744800-3	1808276
KP	CCC	68045123	9/5/2018	25D:2	Viper Energy Se	364	LBS	CCC	YES	CH1662105	1809027
KP	CCC	68085987	9/3/2018	25D:2	Oxbo Corporati	280	LBS	CCC	YES	36846OB	1809010
KP	CCC	68085988	9/3/2018	25D:2	Oxbo Corporati	266	LBS	CCC	YES	36846OB	1809010
KP	CCC	68085989	9/3/2018	25D:2	Oxbo Corporati	270	LBS	CCC	YES	36846OB	1809010
KP	CCC	68231089	9/6/2018	25D:2	BASF (BA00003	382	LBS	CCC	YES	CH541224	1809035
KP	CCC	64072208	4/3/2018	25D:3	Redbell Plastic I	659	LBS	CCC	YES	40519520	1804011
KP	CCC	64119710	4/28/2018	25D:3	Clean Harbors C	249	LBS	CCC	YES	CCC-LIQ-NH	1804323
KP	CCC	64408670	4/4/2018	25D:3	Pentair Water F	307	LBS	CCC	YES	CH1577069	1804016
KP	CCC	64426277	3/30/2018	25D:3	BASF (BA00003	550	LBS	CCC	YES	CH541224	1803256
KP	CCC	64426286	3/30/2018	25D:3	BASF (BA00003	525	LBS	CCC	YES	CH541224	1803256
KP	CCC	64426287	3/30/2018	25D:3	BASF (BA00003	500	LBS	CCC	YES	CH541224	1803256
KP	CCC	64426288	3/30/2018	25D:3	BASF (BA00003	500	LBS	CCC	YES	CH541224	1803256
KP	CCC	64426289	3/30/2018	25D:3	BASF (BA00003	500	LBS	CCC	YES	CH541224	1803256
KP	CCC	64426294	3/30/2018	25D:3	BASF (BA00003	500	LBS	CCC	YES	CH541224	1803256
KP	CCC	64426295	3/30/2018	25D:3	BASF (BA00003	500	LBS	CCC	YES	CH541224	1803256
KP	CCC	64426296	3/30/2018	25D:3	BASF (BA00003	500	LBS	CCC	YES	CH541224	1803256
KP	CCC	64426297	3/30/2018	25D:3	BASF (BA00003	450	LBS	CCC	YES	CH541224	1803256
KP	CCC	64426314	3/30/2018	25D:3	BASF (BA00003	2500	LBS	CCC	YES	CH541224	1803256
KP	CCC	64434020	4/2/2018	25D:3	Triumph Compo	259	LBS	CCC	YES	TCS004	1804005
KP	CCC	64450494	4/11/2018	25D:3	Thermoguard C	459	LBS	CCC	YES	1612772	1804084
KP	CCC	64549199	4/19/2018	25D:3	Usace Lower Gr	421	LBS	CCC	YES	1519484	1804149
KP	CCC	64780995	4/18/2018	25D:3	Carestream (EA	415	LBS	CCC	YES	13-0012-95	1804140
KP	CCC	64781001	4/18/2018	25D:3	Carestream (EA	353	LBS	CCC	YES	13-0082-02	1804140
KP	CCC	64781002	4/18/2018	25D:3	Carestream (EA	128	LBS	CCC	YES	13-0082-02	1804140
KP	CCC	64786079	4/27/2018	25D:3	Emerald Service	326	LBS	CCC	YES	CCC-LIQ	1804221
KP	CCC	64786080	4/23/2018	25D:3	Emerald Service	55	LBS	CCC	YES	CCC-LIQ	1804182
KP	CCC	64786081	4/27/2018	25D:3	Emerald Service	454	LBS	CCC	YES	CCC-LIQ	1804221
KP	CCC	64786082	4/23/2018	25D:3	Emerald Service	55	LBS	CCC	YES	CCC-LIQ	1804182
KP	CCC	64786083	4/23/2018	25D:3	Emerald Service	55	LBS	CCC	YES	CCC-LIQ	1804182
KP	CCC	64786084	4/23/2018	25D:3	Emerald Service	55	LBS	CCC	YES	CCC-LIQ	1804182
KP	CCC	64786086	4/23/2018	25D:3	Emerald Service	55	LBS	CCC	YES	CCC-LIQ	1804182
KP	CCC	64786087	4/23/2018	25D:3	Emerald Service	55	LBS	CCC	YES	CCC-LIQ	1804182
KP	CCC	64786088	4/27/2018	25D:3	Emerald Service	353	LBS	CCC	YES	CCC-LIQ	1804221

Attachment III
Bulk Container Inventory for 9/25/18
(15 pages)

As of 09/25/18 08:00

STACKED

AREA	SLOT	CONTID	CONTENTS	WEIGHT	COMMENTS	CUSTOMER	Proc Code	DATE
50A	06B	207006	7180521	35380	FB4 SHRED	site	ccrk	08/08/18
50A	06A	250107	7180507	16540	FB4 SHRED	Site	ccrk	08/05/18
50A	05A	250322	7180504	20240	FB4 SHRED	Site	ccrk	08/04/18
50A	03A	250323	7180510	16800	FB4 SHRED	Site	ccrk	08/05/18
50A	05B	252133	7180505	24860	FB4 SHRED	Site	ccrk	08/04/18
50A	03B	252138	7180513	24640	FB4 SHRED	Site	ccrk	08/07/18
50A	02A	258186	7180497	19740	FB4 SHRED	Site	ccrk	08/03/18
50A	02B	410577	7180515	20100	FB4 SHRED	Site	ccrk	08/07/18

SLOT	CONTID	CONTENTS	WEIGHT	COMMENTS	CUSTOMER	Proc Code	DATE
50A04	411287	7180411	28000	FB4 SHRED	Site	ccrk	06/26/18
50A51	411305	7180613	45760	FB4 SHRED	Site	ccrk	09/18/18

Not STACKED

AREA	SLOT	CONTID	CONTENTS	WEIGHT	COMMENTS	CUSTOMER	Proc Code	DATE
50B	18A	250282	7180485	23820	FB4 SHRED	Site	ccrk	08/02/18
50B	17A	252024	7180484	26560	FB4 SHRED	Site	ccrk	08/01/18
50B	12A	252070	7180471	27060	FB4 SHRED	Site	ccrk	07/29/18
50B	21B	252145	7180479	29640	FB4 SHRED	Site	ccrk	07/31/18
50B	20A	252175	7180472	22440	FB4 SHRED	Site	ccrk	07/29/18
50B	21A	410896	7180469	25920	FB4 SHRED	Site	ccrk	07/27/18
50B	15A	410997	7180448	22040	FB4 SHRED	Site	ccrk	07/22/18
50B	14A	411067	7180483	25100	FB4 SHRED	Site	ccrk	08/01/18
50B	11B	411141	7180486	30560	FB4 SHRED	Site	ccrk	08/02/18
50B	20B	411185	9180050	40720	FB3 SHRED	Site	ccrk	07/18/18
50B	18B	411314	7180470	39340	FB4 SHRED	Site	ccrk	07/29/18
50B	17B	411325	7180478	31880	FB4 SHRED	Site	ccrk	07/31/18
50B	15B	411350	7180466	34660	FB4 SHRED	Site	ccrk	07/26/18
50B	12B	411738	7180491	30280	FB4 SHRED	Site	ccrk	08/02/18
50B	14B	419963	7180464	41140	FB4 SHRED	Site	ccrk	07/25/18
50B	11A	419977	7180490	26200	FB4 SHRED	Site	ccrk	08/02/18

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NOT STACKED

SLOT	CONTID	CONTENTS	WEIGHT	COMMENTS	CUSTOMER	Proc Code	DATE
50B01	252084	7180439	32700	FB4 SHRED	Site	ccrk	07/11/18
50B02	252037	7180634	22260	FB4 SHRED	Site	ccrk	09/24/18
50B03	411028	7180632	41200	FB4 SHRED	Site	ccrk	09/23/18
50B04	410362	7180442	18100	FB4 SHRED	Site	ccrk	07/12/18
50B05	411061	7180618	28260	FB4 SHRED	Site	ccrk	09/20/18
50B06	411767	7180626	30280	FB4 SHRED	Site	ccrk	09/21/18
50b09	411011	9180066	35900	FB3 Shred	Site	ccrk	09/25/18
50B10	411286	7180410	21220	FB4 SHRED	Site	ccrk	06/26/18
50B19	252054	7180511	12380	FB4 SHRED	Site	ccrk	08/05/18

SLOT	CONTID	CONTENTS	WEIGHT	COMMENTS	CUSTOMER	Proc Code	DATE
57F01	911653	6180040			Site	ccrk	09/24/18
57F02	411175	7180541	36460	FB4 SHRED	Site	ccrk	08/25/18
57F03	320152	7180554	18620	FB4 SHRED	Site	ccrk	08/31/18
57F05	252099	7180624	28600	FB4 SHRED	Site	ccrk	09/21/18
57F07	410649	7180447	16860	FB4 SHRED	Site	ccrk	07/13/18

AREA	SLOT	CONTID	CONTENTS	WEIGHT	COMMENTS	CUSTOMER	Proc Code	DATE
70	30B	250301	7180481	20360	FB4 SHRED	Site	ccrk	08/01/18
70	19A	252053	7180518	23060	FB4 SHRED	Site	ccrk	08/07/18
70	14A	252086	7180516	17120	FB4 SHRED	Site	ccrk	08/07/18
70	30A	252094	7180480	17760	FB4 SHRED	Site	ccrk	07/31/18
70	17A	252126	7180499	16700	FB4 SHRED	Site	ccrk	08/03/18
70	17B	252132	7180597	17420	FB4 SHRED	Site	ccrk	09/13/18
70	09B	255103	7180431	27660	FB4 SHRED	Site	ccrk	07/06/18
70	11B	255133	8180092	24280	Digout	Site	ccrk	09/04/18
70	24A	255142	7180438	22260	FB4 SHRED	Site	ccrk	07/11/18
70	07C	258205	9180045	34800	FB3 SHRED	Site	ccrk	07/02/18
70	28B	270012	7180474	20360	FB4 SHRED	Site	ccrk	07/30/18
70	01B	320132	7180380	25900	FB4 SHRED	Site	ccrk	06/12/18
70	20B	360018	7180314	33420	FB4 SHRED	Site	ccrk	05/14/18
70	03A	360025	7180371	24020	FB4 SHRED	Site	ccrk	06/06/18
70	28A	410112	7180488	19340	FB4 SHRED	Site	ccrk	08/02/18
70	15C	410210	9180063	41000	FB3 SHRED	Site	ccrk	09/08/18
70	08A	410242	7180400	25360	FB4 SHRED	Site	ccrk	06/19/18
70	21A	410461	7180445	18560	FB4 SHRED	Site	ccrk	07/13/18
70	18B	410519	7180590	26040	FB4 SHRED	Site	ccrk	09/12/18
70	18A	410667	7180591	18900	FB4 SHRED	Site	ccrk	09/12/18
70	01C	410989	7180332	37520	FB4 SHRED	Site	ccrk	05/23/18
70	23C	410996	7180327	40500	FB4 SHRED	Site	ccrk	05/22/18
70	24B	411002	7180443	32240	FB4 SHRED	Site	ccrk	07/12/18
70	25C	411008	7180345	42780	FB4 SHRED	Site	ccrk	05/26/18
70	22A	411023	7180322	26240	FB4 SHRED	Site	ccrk	05/16/18
70	21B	411037	7180344	26520	FB4 SHRED	Site	ccrk	05/26/18
70	08B	411053	7180437	27880	FB4 SHRED	Site	ccrk	07/11/18
70	16B	411054	7180412	31240	FB4 SHRED	Site	ccrk	06/27/18
70	10A	411075	7180450	26620	FB4 SHRED	Site	ccrk	07/22/18
70	22B	411077	7180310	30400	FB4 SHRED	Site	ccrk	05/14/18
70	09C	411084	7180408	34340	FB4 SHRED	Site	ccrk	06/26/18
70	03B	411085	7180377	32940	FB4 SHRED	Site	ccrk	06/11/18
70	29A	411089	7180334	27740	FB4 SHRED	Site	ccrk	05/24/18
70	01A	411090	7180340	22520	FB4 SHRED	Site	ccrk	05/25/18
70	23B	411102	7180276	36160	FB4 SHRED	Site	ccrk	04/27/18
70	28C	411111	7180465	42460	FB4 SHRED	Site	ccrk	07/25/18
70	26A	411114	7180321	29240	FB4 SHRED	Site	ccrk	05/16/18

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70	12B	411129	7180546	29760	FB4 SHRED	Site	ccrk	08/29/18
70	08C	411150	7180387	34860	FB4 SHRED	Site	ccrk	06/14/18
70	29B	411151	7180336	29440	FB4 SHRED	Site	ccrk	05/24/18
70	13C	411152	7180545	37440	FB4 SHRED	Site	ccrk	08/29/18
70	06C	411164	9180047	38040	FB4 SHRED	Site	ccrk	07/05/18
70	17C	411166	7180580	43300	FB4 SHRED	Site	ccrk	09/06/18
70	23A	411168	7180311	28860	FB4 SHRED	Site	ccrk	05/14/18
70	09A	411173	7180569	16000	FB4 SHRED	Site	ccrk	09/04/18
70	27C	411174	7180273	37200	FB4 SHRED	Site	ccrk	04/26/18
70	02C	411182	7180342	34520	FB4 SHRED	Site	ccrk	05/25/18
70	25A	411191	7180307	26340	FB4 SHRED	Site	ccrk	05/13/18
70	13B	411198	7180565	29540	FB4 SHRED	Site	ccrk	09/02/18
70	12C	411208	9180062	39940	FB3 SHRED	Site	ccrk	09/08/18
70	11A	411215	7180415	25800	FB4 SHRED	Site	ccrk	06/27/18
70	20A	411217	7180339	28700	FB4 SHRED	Site	ccrk	05/25/18
70	02A	411224	7180330	23640	FB4 SHRED	Site	ccrk	05/23/18
70	07B	411241	7180394	28200	FB4 SHRED	Site	ccrk	06/15/18
70	06B	411247	7180384	25740	FB4 SHRED	Site	ccrk	06/13/18
70	10C	411256	7180562	41220	FB4 SHRED	Site	ccrk	09/01/18
70	14C	411261	7180566	35520	FB4 SHRED	Site	ccrk	09/03/18
70	25B	411273	7180313	26980	FB4 SHRED	Site	ccrk	05/14/18
70	03C	411292	7180390	44020	FB4 SHRED	Site	ccrk	06/14/18
70	20C	411299	7180325	37680	FB4 SHRED	Site	ccrk	05/18/18
70	30C	411312	7180323	29640	FB4 SHRED	Site	ccrk	05/17/18
70	15B	411328	7180574	32460	FB4 SHRED	Site	ccrk	09/05/18
70	12A	411331	7180584	24040	FB4 SHRED	Site	ccrk	09/11/18
70	10B	411341	7180582	30280	FB4 SHRED	Site	ccrk	09/10/18
70	14B	411352	7180579	32800	FB4 SHRED	Site	ccrk	09/06/18
70	19C	411356	9180043	43340	FB3 SHRED	Site	ccrk	06/22/18
70	27A	411363	7180312	28360	FB4 SHRED	Site	ccrk	05/14/18
70	27B	411369	7180315	32780	FB4 SHRED	Site	ccrk	05/15/18
70	05C	411374	7180369	37740	FB4 SHRED	Site	ccrk	06/05/18
70	18C	411376	9180064	44200	FB3 SHRED	Site	ccrk	09/09/18
70	02B	411377	7180337	27600	FB4 SHRED	Site	ccrk	05/24/18
70	16C	411380	7180583	34560	FB4 SHRED	Site	ccrk	09/11/18
70	16A	411381	7180416	26540	FB4 SHRED	Site	ccrk	06/28/18
70	21C	411715	7180444	34860	FB4 SHRED	Site	ccrk	07/12/18
70	04C	411716	9180046	48120	FB4 SHRED	Site	ccrk	07/03/18

70	11C	411722	7180555	36120	FB4 SHRED	Site	ccrk	08/31/18
70	26C	411723	9180044	41520	FB3 SHRED	Site	ccrk	06/23/18
70	07A	411731	7180404	24500	FB4 SHRED	Site	ccrk	06/20/18
70	06A	411736	7180433	16980	FB4 SHRED	Site	ccrk	07/07/18
70	15A	411737	9180061	25720	FB3 SHRED	Site	ccrk	09/07/18
70	04B	411755	7180351	29060	FB4 SHRED	Site	ccrk	06/02/18
70	24C	419921	9180049	51700	FB3 SHRED	Site	ccrk	07/16/18
70	29C	419933	7180306	36820	FB4 SHRED	Site	ccrk	05/13/18
70	05A	419934	7180335	23480	FB4 SHRED	Site	ccrk	05/24/18
70	26B	419946	7180319	36640	FB4 SHRED	Site	ccrk	05/16/18
70	05B	419947	7180333	30160	FB4 SHRED	Site	ccrk	05/23/18
70	19B	419954	7180309	29360	FB4 SHRED	Site	ccrk	05/14/18
70	22C	419978	7180317	37200	FB4 SHRED	Site	ccrk	05/15/18
70	04A	419984	7180399	23420	FB4 SHRED	Site	ccrk	06/19/18
70	13A	419996	7180551	28120	FB4 SHRED	Site	ccrk	08/30/18

SLOT	CONTID	CONTENTS	WEIGHT	COMMENTS	CUSTOMER	Proc Code	DATE
95A53	320062	7180628	36700	FB4 SHRED	Site	ccrk	09/21/18
95A47	320112	7180610	35040	FB4 SHRED	Site	ccrk	09/18/18
95A38	411019	7180629	29720	FB4 SHRED	Site	ccrk	09/22/18
95A34	411086	7180619	26100	FB4 SHRED	Site	ccrk	09/20/18
95A04	411100	8180097	57240	Digout	Site	ccrk	09/14/18
95A02	411221	7180612	26340	FB4 SHRED	Site	ccrk	09/18/18
95A36	411274	7180406	38660	FB4 SHRED	Site	ccrk	06/25/18
95A32	411345	7180611	28620	FB4 SHRED	Site	ccrk	09/18/18
95A37	411750	7180615	40000	FB4 SHRED	Site	ccrk	09/19/18
95A17	419930	7180622	32500	FB4 SHRED	Site	ccrk	09/20/18
95A21	419938	7180608	36440	FB4 SHRED	Site	ccrk	09/17/18
95A48	419952	8180098	31580	Digout	Site	ccrk	09/14/18
95A52	419958	7180603	15080	FB4 SHRED	Site	ccrk	09/16/18
95A19	419968	7180620	18000	FB4 SHRED	Site	ccrk	09/20/18
95A49	911635	6180040			Site	ccrk	09/19/18

SLOT	CONTID	CONTENTS	WEIGHT	COMMENTS	CUSTOMER	Proc Code	DATE
Bay 2W	911640	6180036					08/27/18

SLOT	CONTID	CONTENTS	WEIGHT	COMMENTS	CUSTOMER	Proc Code	DATE
90day	252049	7180598	20520	FB4 SHRED	Site	ccrk	09/13/18
90day	252154	7180599	24640	FB4 SHRED	Site	ccrk	09/13/18
90day	252184	8180096	37260	Digout	Site	ccrk	09/13/18
90day	320213	7180604	40000	FB4 SHRED	Site	ccrk	09/16/18
90day	360026	7180614	46780	FB4 SHRED	Site	ccrk	09/19/18
90day	410155	7180589	39700	FB4 SHRED	Site	ccrk	09/12/18
90day	410231	7180623	34280	FB4 SHRED	Site	ccrk	09/20/18
90day	410430	7180633	24080	FB4 SHRED	Site	ccrk	09/23/18
90day	410991	7180606	33440	FB4 SHRED	Site	ccrk	09/17/18
90day	411004	7180625	32680	FB4 SHRED	Site	ccrk	09/21/18
90day	411016	7180621	25000	FB4 SHRED	Site	ccrk	09/20/18
90day	411045	7180631	31980	FB4 SHRED	Site	ccrk	09/22/18
90day	411047	7180607	24800	FB4 SHRED	Site	ccrk	09/17/18
90day	411106	7180550	38600	FB4 SHRED	Site	ccrk	08/30/18
90day	411162	7180595	33600	FB4 SHRED	Site	ccrk	09/13/18
90day	411181	7180594	29900	FB4 SHRED	Site	ccrk	09/13/18
90day	411194	7180627	31240	FB4 SHRED	Site	ccrk	09/21/18
90day	411213	7180609	30460	FB4 SHRED	Site	ccrk	09/17/18
90day	411263	7180630	33580	FB4 SHRED	Site	ccrk	09/22/18
90day	411270	7180593	20840	FB4 SHRED	Site	ccrk	09/12/18
90day	411275	7180588	40960	FB4 SHRED	Site	ccrk	09/12/18
90day	411869	7180617	45880	FB4 SHRED	Site	ccrk	09/20/18
90day	419920	7180558	44760	FB4 SHRED	Site	ccrk	09/01/18
90day	419931	7180575	30960	FB4 SHRED	Site	ccrk	09/05/18
90day	419961	7180570	23420	FB4 SHRED	Site	ccrk	09/04/18
90day	419998	7180536	26760	FB4 SHRED	Site	ccrk	08/23/18

	Box	LBS	Batch	
A				1
B				
A	258186	19740	7180497	2
B	410577	20100	7180515	
A	250323	16800	7180510	3
B	252138	24640	7180513	
A				4
B	411045	42020	7180512	
A	250322	20240	7180504	5
B	252133	24860	7180505	
A	250107	16540	7180507	6
B	207006	35380	7180521	

KEY	
TOP	A
BOTTOM	B

As of 9/19/18 @ 09:00

Area 50A

	Box	LBS	Batch		Box	LBS	Batch		Box	LBS	Batch	
A				3				2				1
B												
A				6				5				4
B												
A				9				8				7
B												
A	252070	27060	7180471	12	419977	26200	7180490	11				10
B	411738	30280	7180491		411141	30560	7180486					
A	410997	22040	7180448	15	411067	25100	7180483	14				13
B	411350	34660	7180466		419963	41140	7180464					
A	250282	23820	7180485	18	252024	26560	7180484	17				16
B	411314	39340	7180470		411325	31880	7180478					
A	410896	25920	7180469	21	252175	22440	7180472	20				19
B	252145	29640	7180479		411185	40720	9180050					

N

W E

S

AREA 50B

KEY

A

B

	Box	LBS	Batch		Box	LBS	Batch		Box	LBS	Batch	
A	360025	24020	7180371	3	411224	23640	7180330	2	411090	22520	7180340	1
B	411085	32940	7180377		411377	27600	7180337		320132	25900	7180380	
C	411292	44020	7180390		411182	34520	7180342		410989	37520	7180332	
A	411736	16980	7180433	6	419934	23480	7180335	5	419984	23420	7180399	4
B	411247	25740	7180384		419947	30160	7180333		411755	29060	7180351	
C	411164	38040	9180047		411374	37740	7180369		411716	48120	9180046	
A	411173	16000	7180569	9	410242	25360	7180400	8	411731	24500	7180404	7
B	255103	27660	7180431		411053	27880	7180437		411241	28200	7180394	
C	411084	34340	7180408		411150	34860	7180387		258205	34800	9180045	
A	411331	24040	7180584	12	411215	25800	7180415	11	411075	26620	7180450	10
B	411129	29760	7180546		255133	24280	8180092		411341	30280	7180582	
C	411208	39940	9180062		411722	36120	7180555		411256	41220	7180562	
A	411737	25720	9180061	15	252086	17120	7180516	14	419996	28120	7180551	13
B	411328	32460	7180574		411352	32800	7180579		411198	29540	7180565	
C	410210	41000	9180063		411261	35520	7180566		411152	37440	7180545	
A	410667	18900	7180591	18	252126	16700	7180499	17	411381	26540	7180416	16
B	410519	26040	7180590		252132	17420	7180597		411054	31240	7180412	
C	411376	44200	9180064		411166	43300	7180580		411380	34560	7180583	
A	410461	18560	7180445	21	411217	28700	7180339	20	252053	23060	7180518	19
B	411037	26520	7180344		360018	33420	7180314		419954	29360	7180309	
C	411715	34860	7180444		411299	37680	7180325		411356	43340	9188043	
A	255142	22260	7180438	24	411168	28860	7180311	23	411023	26240	7180322	22
B	411002	32240	7180443		411102	36160	7180276		411077	30400	7180310	
C	419921	51700	9180049		410996	40500	7180327		419978	37200	7180317	
A	411363	28360	7180312	27	411114	29240	7180321	26	411191	26340	7180307	25
B	411369	32780	7180315		419946	36640	7180319		411273	26980	7180313	
C	411174	37200	7180273		411723	41520	9180044		411008	42780	7180345	
A	411089	27740	7180334	29	410112	19340	7180488	28				
B	411151	29440	7180336		270012	20360	7180474					
C	419933	36820	7180306		411111	42460	7180465					
A	252094	17760	7180480	30								
B	250301	20360	7180481									
C	411312	29640	7180323									

Planned

As of 9/18/18 11:00

AREA 70

S

E W

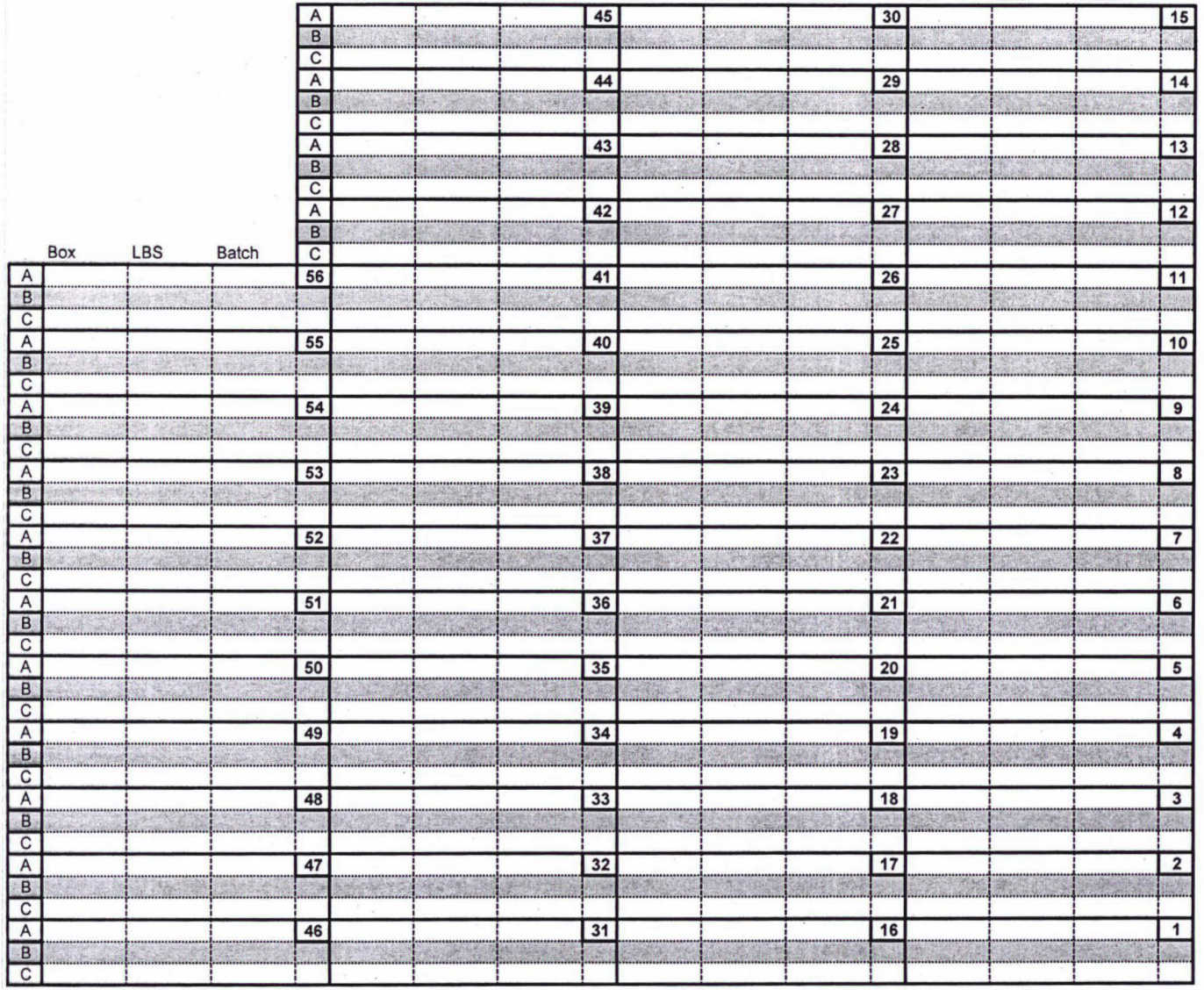
N

KEY

A

B

C



As of

AREA 95

S W ===> E N

KEY
A
B
C

KEY
A
B
C

Attachment IV

Waste Material Profile Sheet, No. CH435466
and Fingerprint Report
(4 pages)

**********SEE CONFIDENTIAL FILE**********

Attachment V

Waste Material Profile Sheet, No. CH1448562
and Fingerprint Report
(6 pages)
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Attachment VI

Waste Material Profile Sheet No. 29829OB

(3 pages)

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Attachment VII

Waste Material Profile Sheet No. 150422

(3 pages)

**********SEE CONFIDENTIAL FILE**********

Attachment VIII

Waste Material Profile Sheet No. CH1052918

(4 pages)

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Attachment IX

Waste Material Profile Sheet No. 1268388

(4 pages)

**********SEE CONFIDENTIAL FILE**********

Attachment X

Waste Material Profile Sheet No. 1471832

(4 pages)

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Attachment XI

Waste Material Profile Sheet No. CH404058
and Fingerprint Report
(4 pages)
**********SEE CONFIDENTIAL FILE**********

Attachment XII
Work Order No. 040013
for Perimeter Fence Emergency Gate
(1 page)